

BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

Hearing Date: March 28, 2018
Time: 10:00 a.m.

Response Due: March 23, 2018
Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,**

Plaintiff,

v.

**BNP PARIBAS S.A., BNP PARIBAS ARBITRAGE
SNC, BNP PARIBAS BANK & TRUST (CAYMAN)
LIMITED, and BNP PARIBAS SECURITIES
SERVICES S.A.,**

Defendants.

Adv. Pro. No. 12-01576 (SMB)

NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE that, upon the accompanying Motion, Memorandum of Law, and Declaration of Jonathan A. Forman, Esq. ("Forman Declaration"), Irving H. Picard, as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.* ("SIPA"), and the estate of Bernard L. Madoff, by and through his undersigned counsel, will move the Court for entry of the proposed Order, submitted herewith, compelling Defendants BNP Paribas S.A., BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust (Cayman) Limited, and BNP Paribas Securities Services S.A. to produce documents responsive to certain discovery requests identified in the accompanying Memorandum of Law and Forman Declaration.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be (i) in writing, conform to the applicable rules of this Court, and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York, 10004, in accordance with Local Rule 9006-1 of the United States Bankruptcy Court, Southern District of New York by no later than 5:00 p.m. on March 23, 2018 (the "Objection Deadline") (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein); and (ii) served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan and Torello H. Calvani; and (b) Securities Investor Protection Corporation, 1667 K Street NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, so as to be received no later than the Objection Deadline. Any objections must state the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, the Motion shall be deemed uncontested and an order

granting the requested relief may be entered with no further notice or opportunity to be heard offered to any party.

Dated: February 9, 2018
New York, NY

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan
David J. Sheehan
Email: dsheehan@bakerlaw.com
Mark A. Kornfeld
Email: mkornfeld@bakerlaw.com
Torello H. Calvani
Email: tcalvani@bakerlaw.com
Jonathan A. Forman
Email: jforman@bakerlaw.com
Joanna F. Wasick
Email: jwasick@bakerlaw.com
Marco Molina
Email: mmolina@bakerlaw.com
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate
of Bernard L. Madoff*